

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
JEANNETTE FULLER HAUSLER, et al., :
 :
Petitioner, :
 :
-against- :
 :
JPMORGAN CHASE BANK, N.A., et al., :
 :
Garnishee-Respondents. :
-----x
JPMORGAN CHASE BANK, N.A., et al., :
 :
Garnishee-Respondents :
and Third-Party :
Petitioners, :
 :
-against- :
 :
BANCO FINANCIERO INTERNACIONAL :
S.A., et al., :
 :
Adverse Claimants- :
Respondents. :
-----x

Civil Action No. 09-CV-10289 (VM)

Related to JPM Chase/Citibank Turnover
Proceeding

In Respect of a Judgment Entered in the
State of Florida, Case No. 02-12475-CA-09

**MOTION TO ADMIT COUNSEL
JUANCARLOS SANCHEZ
PRO HAC VICE**

FILED
DISTRICT COURT
MAR 22 PM 3:54
U.S. DISTRICT COURT
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District

Court for the Southern District of New York, I, William J.F. Roll, III, a member in good standing
of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Juancarlos Sanchez
Avila Rodriguez Hernandez Mena & Ferri LLP
2525 Ponce de Leon Blvd., Suite 1225
Coral Gables, Florida 33134
Telephone: (305) 779-3560
Facsimile: (305) 779-3561

as counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid in
the above-captioned matter. Juancarlos Sanchez is a member in good standing of the Bar of the

MAR 22 2011

90-85-932933

CASE NO.: 09-cv-10289 VM

State of Florida (Florida Bar No. 867071), as evidenced by the Certificate of Good Standing annexed to the Affidavit filed in support of this Motion. As far as I am aware, there are no pending disciplinary proceedings against Juancarlos Sanchez in any State or Federal court.

Dated: March 18, 2011
New York, New York

Respectfully submitted,

SHEARMAN & STERLING LLP

By:



William J.F. Roll, III

599 Lexington Avenue
New York, NY 10022
(212) 848-4000
wroll@shearman.com

Attorneys for Adverse Claimant-Respondent
CAJA DE AHORROS Y MONTE DE PIEDAD DE
MADRID

**UNITED STATES DISTRICT COURT
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JPMORGAN CHASE BANK, N.A., et al.,	:	Civil Action No. 09-CV-10289 (VM)
	:	
Garnishee-Respondents.	:	Related to JPM Chase/Citibank Turnover Proceeding
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JPMORGAN CHASE BANK, N.A., et al.,	:	
	:	In Respect of a Judgment Entered in the
Garnishee-Respondents	:	State of Florida, Case No. 02-12475-CA-09
and Third-Party	:	
Petitioners,	:	AFFIDAVIT OF WILLIAM J.F. ROLL,
	:	III IN SUPPORT OF MOTION TO
-against-	:	ADMIT COUNSEL, JUANCARLOS
	:	SANCHEZ, PRO HAC VICE
BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al.,	:	
	:	
Adverse Claimants-	:	
Respondents.	:	
-----X		

State of New York)
) ss:
County of New York)

WILLIAM J.F. ROLL, III, being duly sworn, hereby deposes and says:

1. I am a member of the firm of Shearman & Sterling LLP, counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid ("Caja Madrid") in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit in support of the motion to admit Juancarlos Sanchez as counsel *pro hac vice* to represent Caja Madrid in this case.

2. I am a member in good standing of the bar of the State of New York, and I was admitted to practice law in the State in January 1980. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am a member in good standing of this Court.

3. Mr. Sanchez is an associate at the law firm of Avila Rodriguez Hernandez Mena & Ferri LLP in Coral Gables, Florida. I have found Mr. Sanchez to be a skilled attorney and a person of integrity. I understand that he is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. Annexed hereto as Exhibit A is a copy of a Certificate of Good Standing averring that Mr. Sanchez is a member in good standing of the Bar of the State of Florida.

4. Accordingly, I am pleased to move the admission of Juancarlos Sanchez *pro hac vice*, in this case. A proposed order granting the admission of Juancarlos Sanchez, *pro hac vice*, is annexed hereto as Exhibit B.



WILLIAM J. F. ROLL, III

State of NY
County of NY

Sworn to before me
this 18th day of March, 2011



Notary Public

BRYAN JANKAY
Notary Public, State of New York
No. 01JA6172051
Qualified in Nassau County
Certificate filed in New York County
Commission Expires August 6, 2011

EXHIBIT A



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 867071
Juancarlos Sanchez
Avila Rodriguez Hernandez Mena &
Ferri, LLP
2525 Ponce De Leon Blvd., Ste. 1225
Coral Gables, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on October 4, 2004.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 9th day of March, 2011.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/ecW:R10

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Civil Action No. 09-CV-10289 (VM)

Related to JPM Chase/Citibank Turnover Proceeding

In Respect of a Judgment Entered in the State of Florida, Case No. 02-12475-CA-09

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of William J.F. Roll, III, counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid, and his sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Juancarlos Sanchez
Avila Rodriguez Hernandez Mena & Ferri LLP
2525 Ponce de Leon Blvd., Suite 1225
Coral Gables, Florida 33134
Telephone: (305) 779-3560
Facsimile: (305) 779-3561
jsanchez@arhmf.com

is admitted to practice *pro hac vice* as counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid in the above-captioned case in this Court. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: March __, 2011
New York, New York

Hon. Victor Marrero
U.S.D.J.

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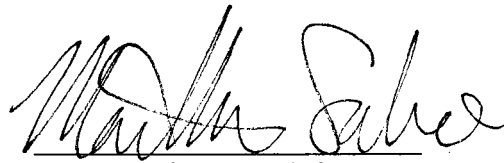
In Respect of a Judgment Entered in the
State of Florida, Case No. 02-12475-CA-09

CERTIFICATE OF SERVICE

I, Martha C. H. Sabo, hereby certify that on March 22, 2011, I caused a true and correct copy of the Motion to Admit Counsel Juancarlos Sanchez *Pro Hac Vice* and Affidavit of William J.F. Roll, III in Support of same to be served on the counsel of record listed on the attached service list, via U.S. Mail and electronic mail. In addition, I certify that I caused a true and correct copy of the foregoing Motion and Affidavit to be served via U.S. Mail on the following counsel of record:

James D. Pagliaro
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921

Dated: March 22, 2011
New York, New York


Martha C. H. Sabo

SERVICE LIST

Alfonso J. Perez

RASCO REININGER PEREZ & ESQUENAZI
283 Catalonia Avenue
2nd Floor
Coral Gables, FL 33134
aperez@rrpev.com

Karen Olivia-Marie Stewart

Roberto Martinez
COLSON, HICKS & EIDSON
255 Aragon Avenue
2nd Floor
Coral Gables, FL 33134-5008
karen@colson.com
bob@colson.com

Daniel Feist Schreck

LAW OFFICES OF G. OLIVER KOPPEL & ASSOC.
99 Park Avenue, Ste. 800
New York, NY 10016
dschreck@koppellaw.com

James Wilson Perkins

GREENBERG TRAURIG LLP (NYC)
200 Park Avenue
New York, NY 10166
perkinsj@gtlaw.com

David Alan Baron

GREENBERG TRAURIG LLP
2101 L Street, NW
Washington, DC 20037
barond@gtlaw.com

James Loran Kerr
Ian Craig Richardson
Matteo Joshua Rosselli
Thomas Matthew Noone
DAVIS POLK & WARDWELL L.L.P.
450 Lexington Avenue
New York, NY 10017
jkerr@dpw.com
ian.richardson@davispolk.com
matteo.rosselli@dpw.com
thomas.noone@dpw.com

Mark Putnam Gimbel
Pamela Anne Carter
COVINGTON & BURLING LLP (NYC)
620 Eighth Avenue
New York, NY 10018-1405
mgimbel@cov.com
pcarter@cov.com

Frank Panopoulos
Nicole Erb
WHITE & CASE LLP (DC)
701 Thirteenth Street, NW
Washington, DC 20005
fpanopoulos@whitecase.com
nerb@whitecase.com

Jason William Sunshine
AKIN GUMP STRAUSS HAUER & FELD LLP (NYC)
One Bryant Park
New York, NY 10036
jsunshine@akingump.com

Paulo Roberto Lima
HUNTON & WILLIAMS LLP (NYC)
200 Park Avenue, 52nd Floor
New York, NY 10166
plima@hunton.com

Bernard J. Garbutt , III
MORGAN, LEWIS AND BOCKIUS LLP (NY)
101 Park Avenue
New York, NY 10178
bgarbutt@morganlewis.com

Claurisse Ann Campanale-Orozco
TISDALE LAW OFFICES, L.L.C.
60 East 42nd Street
Suite 1638
New York, NY 10165
Corozco@tisdale-law.com

Joshua Douglas Weedman
Kenneth Andrew Caruso
Matthew Robert Belz
WHITE & CASE LLP (NY)
1155 Ave of the Americas
New York, NY 10036
jweedman@whitecase.com
kcaruso@whitecase.com
matthew.belz@whitecase.com

Brian Christopher Dunning
VENABLE LLP (NYC)
1270 Ave of the Americas
New York, NY 10020
bcdunning@venable.com